

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PLUMBERS & PIPEFITTERS NATIONAL
PENSION FUND, and JUAN FRANCISCO
NIEVES, as Trustee of the Gonzalez Coronado
Trust, Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

Case No.: 1:16-cv-3591-GHW

KEVIN DAVIS and AMIR ROSENTHAL,

Defendants.

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**NOTICE OF LEAD PLAINTIFF’S UNOPPOSED MOTION FOR
FINAL APPROVAL OF THE PROPOSED SETTLEMENT AND
APPROVAL OF THE PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff United Association National Pension Fund f/k/a Plumbers & Pipefitters National Pension Fund (“UANPF” or “Lead Plaintiff”), on behalf of itself and all other members of the Settlement Class, through court-appointed Lead Counsel in the above-captioned class action (“Action”), Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”), will move this Court on November 18, 2022 at 3:30 p.m., in the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 12C, New York, New York 10007, before the Honorable Gregory H. Woods, for entry of an Order and Final Judgment, under Rule 23 of the Federal Rules of Civil Procedure, approving the proposed Settlement as fair, reasonable, and adequate, approving the proposed Plan of Allocation for the proceeds of the Settlement as fair,

reasonable, and adequate, finally certifying the Settlement Class for the purposes of the Settlement, appointing the Lead Plaintiff as a representative of the Settlement Class and finally appointing Cohen Milstein as Class Counsel for purposes of the Settlement.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff submits and is filing herewith: (i) the Memorandum of Law in Support of Lead Plaintiff's Unopposed Motion for Final Approval of the Proposed Settlement and Approval of the Plan of Allocation, dated October 14, 2022; and (ii) the Declaration of Carol V. Gilden in Support of Lead Plaintiff's Unopposed Motion for Final Approval of the Proposed Settlement and Approval of the Plan of Allocation and Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, dated October 14, 2022, with annexed exhibits.

Dated: October 14, 2022

Respectfully submitted,

Carol V. Gilden

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